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VIA ECF

Hon. Analisa Torres Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 15D New York, NY 10007-1312

Re: United States of America v. Spencer, 20 Cr. 78(AT)

Dear Judge Torres,

I represent defendant Jonell Danforth in the above-captioned matter. I am writing to respectfully request a one-day extension to the February 12th, 2020 filing deadline for requests for modification of bail conditions for my client. I have conferred with the Government who consents to this request on the condition that it be allowed to submit its response on Tuesday the 18th, since Monday the 17th is a federal holiday.

The reason for this request is that I was unable to visit my client at the MCC yesterday due to an elevator malfunction that caused legal visits to be suspended. I also went to the MCC earlier today but could not visit my client because several attorneys were already in line ahead of me. I did not have the necessary time available to wait for a visiting room to be free because of a scheduled conference in another matter. I plan to visit Mr. Danforth at the MCC tomorrow to discuss whether to make this application to the Court, and what information to include.

I thank the Court in advance for its attention to this matter.

GRANTED. By **February 13, 2020**, Defendant Jonell Danforth shall file a request for modification of bail conditions. By **February 18, 2020**, the Government shall file its response.

Very truly yours,

Daniel A. McGuinness

SO ORDERED.

Dated: February 12, 2020

New York, New York

ANALISA TORRES United States District Judge